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14 UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

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16 DAVID M. FRIEDMAN *et al.*,

17 On behalf of all others similarly situated,

18 Plaintiffs,

19 v.

20 CALIFORNIA STATE EMPLOYEES
ASSOCIATION *et al.*,

21 Defendants.

Case No. CIV-S-00-00101 WBS/DAD

CLASS ACTION

STIPULATION AND ORDER
SUBMITTING THE MOTION FOR
APPROVAL OF CLASS NOTICE OF
PLAINTIFFS' MOTION FOR AWARD OF
ATTORNEYS' FEES, COSTS AND
EXPENSES ON THE RECORD

HEARING DATE: April 26, 2010

TIME: 2:00 p.m.

Courtroom of Judge William B. Shubb,
Courtroom 5, 14th Floor, Sacramento, CA

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26 Pursuant to L.R. 143 and 230(g), Plaintiffs David M. Friedman *et al.*, and Defendant
27 California State University Employees Union, SEIU Local 2579, California State Employees

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1 Association,¹ and Defendant State Controller John Chiang,² by and through their undersigned
2 counsel, hereby respectfully submit the following Stipulation Submitting the Motion for
3 Approval of Class Notice of Plaintiffs' Motion for Award of Attorneys' Fees, Costs and
4 Expenses on the Record and Briefs on File:

5 1. On March 24, 2010, Plaintiffs filed their Motion for Approval of Class Notice of
6 Plaintiffs' Motion for Award of Attorneys' Fees, Costs and Expenses (Doc. No. 278) and related
7 papers (Doc. Nos. 279-280).

8 2. Both Defendants filed Statements of Non-Opposition to Plaintiffs' Motion for
9 Approval of Class Notice (Doc. Nos. 284 & 285).

10 3. Counsel for Plaintiffs and Defendants wish to submit the Motion for Approval of
11 Class Notice of Plaintiffs' Motion for Award of Attorneys' Fees, Costs and Expenses on the
12 record and without oral argument.³

13 DATED: April 16, 2010

14 Respectfully submitted,



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17 Milton L. Chappell, Esq. (*Pro hac vice*)
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23 ¹This is the current correct name of the defendant initially sued as "Defendant California
State Employees Association, Local 1000, Service Employees International Union, AFL-CIO,
CLC."

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25 ²Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, State Controller John
Chiang is automatically substituted as a defendant in this matter in place of his predecessor and
26 original defendant, Kathleen Connell.

27 ³If the Court has any questions for counsel or wishes to proceed with oral argument, all
counsel request that they be permitted to attend the hearing by telephone: Milton L. Chappell at
28 (301) 770-3329; Jeffrey B. Demain at (415) 421-7151; Douglas J. Woods at (916) 324-4663.

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Attorneys for Plaintiffs and the Class

IT IS SO STIPULATED.

Dated: April 16, 2010

/s/ Jeffrey B. Demain (as authorized on April 12,
2010)

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Attorneys for Defendant California State University Employees Union, SEIU Local 2579, California State Employees Association

Dated: April 16, 2010

Edmund G. Brown, Jr.
Attorney General of California

/s/ *Douglas J. Woods* (as authorized on April 13, 2010)

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*Attorneys for Defendant John Chiang,
Controller of the State of California*

1 IT IS SO ORDERED.
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4 Dated: April 16, 2010
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6 WILLIAM B. SHUBB
7 UNITED STATES DISTRICT JUDGE
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PROOF OF SERVICE

I hereby certify, under penalty of perjury, that a true and correct copy of this Stipulation and Order Submitting Motion to Enter Judgment was deposited in the United States Mail, first-class postage pre-paid, addressed to:

Nancy T. Yamada
Cal State University Employees Union, SEIU Local 2579
California State Employees Association
1108 "O" Street, 5th Floor
Sacramento, CA 95814

*Attorney for Defendant California State University Employees Union, SEIU Local 2579,
California State Employees Association*

I further certify, under penalty of perjury, that I electronically filed with the Clerk of the Court the foregoing Stipulation and Order Submitting Motion to Enter Judgment, using the CM/ECF system which will send notification of such filing to

Jeffrey B. Demain
*Attorney for Defendant California State University Employees Union, SEIU Local 2579,
California State Employees Association*

Douglas J. Woods
Attorney for Defendant John Chiang, Controller of the State of California

All of these actions were taken on the 16th day of April, 2010.



Milton L. Chappell, Esq. (*pro hac vice*)